

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN
DISTRICT OF PENNSYLVANIA
CIVIL ACTION NO. 1:11-cv-101-SPB

VIDEOTAPED DEPOSITION OF CRYSTAL ANN VICTORIA BYRD

CRYSTAL BYRD and BRIAN BYRD, Individually
and on Behalf of all similarly situated
persons,

Plaintiffs,

vs.

AARON'S, INC., et al.,

Defendants.

301 East Lathrop Road

Casper, Wyoming

July 25, 2013

EXHIBIT

B

tabbies

1 APPEARANCES:

2 LEVIN, FISHBEIN, SEDRAN & BERMAN
Attorneys at Law
3 510 Walnut Street, Suite 500
Philadelphia, PA 19106
4 by FREDERICK S. LONGER

5
6 JAMIESON & ROBINSON
Attorneys at Law
7 214 South Grant Street
Casper, WY 82601
8 by JOHN H. ROBINSON and KYLE RIDGEWAY

9 For the Plaintiffs

10
11 ALSTON & BIRD, LLP
Attorneys at Law
12 One Atlantic Center
1201 West Peachtree Street
13 Atlanta, Ga 30209
by T.C. SPENCER PRYOR and KRISTINE McALISTER BROWN

14 For the defendant Aaron's, Inc.

15
16 BUCHANAN INGERSOLL & ROONEY
Attorneys at Law
17 One Oxford Center
301 Grant Street, 20th Floor
18 Pittsburgh, PA 15219-1410
by MATTHEW H. MEADE

19 For the Defendants

20
21 Also Present:

22 Mr. Brian Byrd
Mr. Jacek Boguski, Videographer
23
24
25

I N D E X O F E X A M I N A T I O N

Page No.

WITNESS:

CRYSTAL ANN VICTORIA BYRD

EXAMINATION BY MS. BROWN..... 9

EXAMINATION BY MR. LONGER..... 95

EXHIBITS:

1

2

3

4

5

6

7

8

9

10

1 PURSUANT TO NOTICE, the deposition of
2 Crystal Ann Victoria Byrd was taken in accordance with the
3 applicable Federal Rules of Civil Procedure at 301 East
4 Lathrop Road, Casper, Wyoming, commencing at the hour of
5 9:08 a.m., the 25th day of July, 2013, before me, Alexis
6 Anderson, a Registered Professional Reporter and Notary
7 Public of the State of Wyoming.

1 A. It is a Google search.

2 Q. And, again, what is in the Google search bar
3 there?

4 A. Nothing.

5 Q. And does this document convey anything that is
6 confidential about you?

7 A. No.

8 Q. Okay. Do you have any reason to think that
9 Aspen Way showed the information that you allege was
10 taken from your computer to any other person or entity?

11 MR. LONGER: I don't understand the
12 question.

13 MS. BROWN: Sure.

14 MR. LONGER: Can you repeat it or restate
15 it?

16 MS. BROWN: Sure.

17 Q. (BY MS. BROWN) Do you have any reason to think
18 that Aspen Way showed the information that was taken from
19 your computer to anyone else?

20 A. I would think so. They gave the picture to the
21 Aaron's employee that came to my house, and who knows
22 what other employees seen all of the photos, I guess.

23 Q. Okay. So it is your -- you know that the
24 employee who came to your house saw the image, correct?

25 A. Yes.

1 Q. Do you know that any other Aspen Way employees
2 saw the information that was taken from your computer?

3 A. No, I do not.

4 Q. And do you know whether, outside of Aspen Way,
5 do you know whether Aspen Way showed the information
6 taken from your computer to anyone outside the company,
7 outside Aspen Way?

8 A. No, I do not know.

9 Q. Do you have any reason to think, as you sit
10 here today, that Aaron's, Inc., viewed the information
11 that was taken from your computer before this lawsuit was
12 filed?

13 A. It is, to my understanding, that all the
14 information gets sent through Aaron's and DesignerWare.
15 So every single person could have seen it.

16 Q. Every single person who?

17 A. Like, Aaron's corporation, all of the
18 DesignerWare people and all of the other companies.

19 Q. So you think that they could have seen it. Is
20 that what you said?

21 A. Yes.

22 Q. Do you have any reason to think that they did
23 see it?

24 A. That's what I'm saying. That's my reason to
25 think that they could have -- they could have seen it.